

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

The Estate of Gene B. Lokken, Glennette Kell,
Darlene Buckner, Carol Clemens, Frank
Chester Perry, The Estate of Jackie Martin,
John J. Williams, as Trustee of the Miles and
Carolyn Williams 1993 Family Trust, and
William Hull, individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., UNITED
HEALTHCARE, INC., NAVIHEALTH,
INC., and Does 1-50, inclusive,

Defendants.

Civil File No. 23-cv-03514-JRT-DTS

**DEFENDANTS' MOTION TO
DISMISS PLAINTIFFS' FIRST
AMENDED CLASS ACTION
COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), Defendants hereby move the Court for an order dismissing Plaintiffs' First Amended Class Action Complaint with prejudice.

This Motion to Dismiss the First Amended Complaint is based on Defendants' Memorandum of Law in Support of this Motion, declarations and exhibits thereto, all files and records of this case and upon such other evidence and argument as the Court may permit at the hearing of this matter.

Dated: May 20, 2024

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